

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Consumer Financial Protection Bureau
and
United States of America,
Plaintiffs,
v.

Trident Mortgage Company LP,
Defendant.

Case No. 2:22-cv-02936-KNS

**UNOPPOSED MOTION TO TERMINATE CONSENT ORDER
AND DISMISS WITH PREJUDICE**

Plaintiffs the Consumer Financial Protection Bureau and the United States of America, by and through undersigned counsel, file this unopposed motion to provide the Court with a status update and to respectfully request termination of the Consent Order and dismissal of this case with prejudice.

The Court entered a Consent Order in this case on September 14, 2022 (ECF 13). The Consent Order states that its requirements will remain in effect for five (5) years or longer if Trident Mortgage Company LP (Trident) has not invested all money required by the order. (*Id.* ¶ 64). The Order also states that other modifications may be made upon approval of the Court, by motion of any Party. (*Id.* ¶ 68).

In support of this motion, the United States advises the Court that Trident has demonstrated a commitment to remediation, and:

1. Trident has fully disbursed the loan subsidy fund (\$18,400,000) as required (*see id.* ¶ 7);

2. Trident paid the civil money penalty (\$4,000,000) to the Consumer Financial Protection Bureau (*see id.* ¶ 39); and
3. Trident is substantially in compliance with the other monetary and injunctive terms of the Consent Order.

We have conferred with Trident and Trident does not oppose the motion.

WHEREFORE, for these reasons, Plaintiffs respectfully request that the Court enter the attached Order terminating the Consent Order and dismissing this case with prejudice.

Respectfully submitted this 23rd day of May, 2025.

FOR THE CONSUMER FINANCIAL PROTECTION BUREAU:

MARK PAOLETTA
Chief Legal Officer

VICTORIA DORFMAN
Senior Legal Advisor

CARA PETERSEN
Acting Enforcement Director

DEBORAH MORRIS
Deputy Enforcement Director

/s/ Rebecca Golubock Watson
REBECCA GOLUBOCK WATSON
CHELSEA PETER
Enforcement Attorneys
Consumer Finance Protection Bureau
1700 G Street NW
Washington, DC 20552
Telephone: (202) 435-7895
Rebecca.Watson@cfpb.gov
Chelsea.Peter@cfpb.gov

FOR THE UNITED STATES:

DAVID METCALF
United States Attorney
Eastern District of Pennsylvania

GREGORY B. DAVID
Assistant United States Attorney
Chief, Civil Division

GERALD B. SULLIVAN
Assistant United States Attorney
615 Chester Street, Suite 1250
Philadelphia, PA 19106
Phone: (215) 861-8786
Fax: (215) 861-8618
Gerald.Sullivan@usdoj.gov

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

CARRIE PAGNUCCO
Chief

/s/ Jennifer Slagle Peck
JENNIFER A. SLAGLE PECK
Deputy Chief
Housing & Civil Enforcement Section
950 Pennsylvania Ave. NW – 4CON
Washington, DC 20530
Phone: (202) 514-4713
Fax: (202) 514-1116
Jennifer.Slagle.Peck@usdoj.gov

CERTIFICATE OF COUNSEL

Pursuant to Local Rule of Civil Procedure 7.1(b), I certify that this Unopposed Motion to Terminate Consent Order and Dismiss with Prejudice is uncontested.

Dated: May 23, 2025

/s/ Jennifer Slagle Peck
JENNIFER A. SLAGLE PECK
Deputy Chief
Housing & Civil Enforcement Section
950 Pennsylvania Ave. NW – 4CON
Washington, DC 20530
Phone: (202) 514-4713
Fax: (202) 514-1116
Jennifer.Slagle.Peck@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on May 23, 2025, a true and correct copy of the above “Unopposed Motion to Terminate Consent Order and Dismiss with Prejudice” was served on counsel of record in this matter via the Court’s CM/ECF system, if registered.

/s/ Jennifer Slagle Peck
JENNIFER A. SLAGLE PECK
Deputy Chief
Housing & Civil Enforcement Section
U.S. Department of Justice